

EXHIBIT 3

In the Matter Of:

FREEMAN v

DEEBS-ELKENANEY

CAROLE CHASKI, PH.D.

September 28, 2023



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UNITED DISTRICT COURT

SOUTHERN DISTRICT OF NEW YORK

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LYNNE FREEMAN, an individual,

Plaintiff,

VS. Civil Action No.
1:22-cv-02435-LLS-SN

TRACY DEEBS-ELKENANEY P/K/A
TRACY WOLFF, an individual,
EMILY SYLVAN KIM, an individual,
PROSPECT AGENCY, LLC, a New
Jersey Limited Liability Company,
ENTANGLED PUBLISHING, LLC, a
Delaware Limited Liability
Company, HOLTZBRINCK PUBLISHERS,
LLC D/B/A MACMILLAN, a New York
Limited Liability Company, and
UNIVERSAL STUDIOS, LLC, a
Delaware Limited Liability Company,

Defendants.

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REMOTE VIDEOTAPED DEPOSITION

OF

CAROLE E. CHASKI, Ph.D.

Thursday, September 28, 2023

Reported by:
AYLETTE GONZALEZ, RPR, CLR, CCR
JOB NO. 2023-911535

DATE: September 28, 2023

TIME: 12:00 p.m.

Remote videotaped deposition of
CAROLE E. CHASKI, Ph.D., pursuant to
NOTICE, before AYLETTE GONZALEZ, a
Registered Professional Reporter, Certified
LiveNote Reporter, Certified Court Reporter
and Notary Public of the States of New
York, New Jersey, Pennsylvania, Delaware
and Texas.

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R E M O T E A P P E A R A N C E S :

DONIGER / BURROUGHS LAW FIRM

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Counsel for Defendants

TRACY DEEBS-ELKENANEY P/K/A TRACY WOLFF,

ENTANGLED PUBLISHING, LLC, HOLTZBRINCK

PUBLISHERS, LLC d/b/a MACMILLAN and

UNIVERSAL CITY STUDIOS LLC

41 Madison Avenue

New York, New York 10010

BY: BENJAMIN HALPERIN, ESQ.

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1 DR. CHASKI (9/28/2023)

2 Q. So do you consider that
3 evidence of copy-paste plagiarism here?

4 A. It could be considered
5 copy-paste because even though six words in
6 a row is considered the standard by, you
7 know, five or seven -- five to seven
8 different researchers on this topic, what's
9 interesting is that smaller words in a row
10 have also been used in forensic cases.

11 So for instance, in the
12 unabomber case, David Kaczynski recognized
13 a three-word phrase in the manifesto, which
14 was cool-headed logician. When he called
15 the FBI, you know, to mention that this
16 might be his brother Ted, the FBI agent who
17 supervised that result had spoken about how
18 cool-headed logician, that's only a three
19 words in a row. But it was in the
20 manifesto and it was in Kaczynski's known
21 work and it did lead to them actually
22 getting a warrant and being able to go to
23 the cabin and find the manifesto itself,
24 the original version.

25 So even Coulthard says in his

DR. CHASKI (9/28/2023)

Coulthard and Johnson 2007, he says look, here's something with four running words in a row. Now, that's way lower than his ten, but he recognizes that even four words in a row might be indicative of copy-paste plagiarism. So these chapter titles being formatted this way could be indicative of copy-paste plagiarism, even though they're less than the six-words-in-a-row consensus.

MR. HALPERIN: Move to strike that answer as non-responsive to my question.

Q. The question I'll ask now is, is it your expert opinion sitting here today, that Tracy Wolff committed copy-paste plagiarism of the formatting of Lynne Freeman's chapter titles in her prepublication versions of Crave?

A. I would not accuse her of copy-paste plagiarism of the titles. I would ask why, why -- what explains that coincidence. It's not her habit. One of the interesting things about her style is that she really makes interesting chapter